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April 23, 2025

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BY ECF

The Honorable Margaret M. Garnett
United States District Judge
40 Foley Square, Room 2102
New York, NY 10007

**Re: *Pospisil, et al. v. ATP Tour, Inc., et al.*, No. 1:25-cv-02207-MMG (S.D.N.Y.)
Request for Adjournment of Initial Pretrial Conference**

Dear Judge Garnett:

We represent Defendant ATP Tour, Inc. in this case. We write jointly on behalf of all Defendants to request the Court's consideration of a brief adjournment of the Initial Pretrial Conference, currently scheduled for May 8, 2025, until after Defendants file their responses to Plaintiffs' complaint.

After the Initial Pretrial Conference was scheduled (ECF No. 16), Defendants moved—with Plaintiffs' consent—for an extension of time to answer or otherwise respond to the complaint, noting that the proposed approach “would be efficient for all and for the Court.” (ECF No. 51). The Court subsequently granted that request, and extended the deadline to answer, move, or otherwise respond to the complaint until May 20, 2025, with briefing on any motions concluding on August 21, 2025. (ECF Nos. 54-55). Thereafter, on April 11, 2025, the Court held an evidentiary hearing during which time Plaintiffs and ATP Tour, Inc. presented, *inter alia*, background information regarding the matter and certain claims.

Defendants currently are preparing and investigating responses to the complaint, and believe those efforts will inform our collective understanding of the scope and cadence of appropriate discovery and other matters to be discussed at the Initial Pretrial Conference. Accordingly, we respectfully submit that adjourning the May 8, 2025 conference until June 19, 2025 or later, will allow the parties to have a more productive and efficient Initial Pretrial Conference and Rule 26(f) conference (which is to occur at least 21 days before the Initial Pretrial Conference).

Plaintiffs object to this request. This is the first request for an adjournment of the Initial Pretrial Conference.

Other than sufficiency of service of the complaint, Defendants continue to expressly preserve all other defenses or objections, including those based on lack of jurisdiction.



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Respectfully submitted,

/s/ Bradley I. Ruskin
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Counsel for Defendant ATP Tour, Inc.

cc: All counsel of record

Application GRANTED in part. The Initial Pretrial Conference currently scheduled for May 8, 2025, is hereby ADJOURNED to **Tuesday, May 27, 2025, at 11:00 a.m.** The conference shall be held in person in Courtroom 110 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007. The parties' joint letter and proposed Civil Case Management Plan and Scheduling Order shall be due no later than **May 20, 2025**. The Clerk of Court is respectfully directed to terminate Dkt. No. 65.

SO ORDERED. Date: 4/30/2025.

A handwritten signature in black ink, appearing to read "Margaret M. Garnett", written over a horizontal line.

HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE